

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN SECTION OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE
TATE, JEREMY S. MELTON, ESTATE OF ISSACCA
POWELL, KEITH BURGESS, TRAVIS BOYD,
TERRENCE DRAIN, and KIMBERLY ALLEN on
behalf of themselves and all similarly situated persons,

PLAINTIFFS,

V.

BILL OLDHAM, in his individual capacity as former Sheriff of Shelby County, Tennessee; FLOYD BONNER, JR., in his official capacity as Sheriff of Shelby County, Tennessee; ROBERT MOORE, in his individual capacity as former Jail Director of Shelby County, Tennessee; KIRK FIELDS, in his official capacity as Jail Director of Shelby County, Tennessee; CHARLENE McGHEE, in her individual capacity as former Assistant Chief of Jail Security of Shelby County, Tennessee; REGINALD HUBBARD, in his official capacity as Assistant Chief of Jail Security of Shelby County, Tennessee; DEBRA HAMMONS, in her individual capacity as former Assistant Chief of Jail Programs of Shelby County, Tennessee; TIFFANY WARD in her official capacity as Assistant Chief of Jail Programs of Shelby County, Tennessee; SHELBY COUNTY, TENNESSEE, a Tennessee municipality; TYLER TECHNOLOGIES, INC., a foreign corporation; GLOBAL TEL*LINK CORPORATION, a foreign corporation; SOFTWARE AG USA, INC., a foreign corporation; and SIERRA-CEDAR, INC., a foreign corporation, SIERRA SYSTEMS GROUP, INC., a foreign corporation.

DEFENDANTS.

Case No. 2:16-cv-2907-SHM/tmp

CLASS ACTION COMPLAINT
FOR VIOLATIONS OF THE
CIVIL RIGHTS ACT OF 1871,
42 U.S.C. § 1983, TENNESSEE
COMMON LAW,
DECLARATORY, AND
INJUNCTIVE RELIEF

**JURY TRIAL DEMANDED
PURSUANT TO FED. R. CIV.
PRO. 38(a) & (b)**

NOTICE TO TAKE DEPOSITION OF JUDGE GERALD SKAHAN

To: Judge Gerald Skahan
c/o Robert E. Craddock, Esq.
Odell Horton, Jr., Esq.
Meghan Cox, Esq.
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Drive, Suite 800
Memphis, Tennessee 38120
(901) 537-1000
rcraddock@wyattfirm.com
ohorton@wyattfirm.com
mcox@wyattfirm.com

Please take notice that pursuant to Rule 30(a)(1) of the Federal Rules of Civil Procedure, Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, the Estate of Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen will take the deposition of Judge Gerald Skahan, individually, via videoconference¹, commencing on **Wednesday, November 18, 2020 at 9:30 a.m.**, Central Standard Time, and continuing thereafter from hour to hour and day to day until complete.

The deposition will be taken on behalf of Plaintiffs for the purposes of discovery, use as evidence, preservation of testimony, and all other purposes authorized by law and will be recorded by a certified court reporter with Huseby Court Reporting, through Zoom, who will record the deposition by means of stenograph and/or audio recordings. The deposition may also be recorded by video or other visual and electronic means. A representative from Huseby Court Reporting will

¹ “Teleconference” is defined to mean any means of taking the deposition that utilizes telecommunications technology including, but not limited to, telephone, videoconference, Voice Over Internet Protocol audio. The specific details of the method shall be provided either by the attorney noticing this deposition or by the entity providing the teleconference service. The method of taking the deposition shall govern the manner in which exhibits shall be presented to the deponent, but the deponent should be prepared to have access to a computer with a high-speed internet connection, video capability, Adobe Flash, and a Google Chrome browser. As of the date of this Notice, the attorney giving notice of the deposition intends to utilize Huseby Connect or Zoom as the specific mechanism to take the deposition. In the event that this is not feasible for the deponent, deponent should contact the attorney giving notice of this deposition as soon as practicable to make alternative arrangements.

contact all attorneys that are parties to this action in order to provide the Zoom invite prior to the date of the deposition.

Respectfully submitted,

/s/ Michael G. McLaren

Michael G. McLaren (#5100)

William E. Cochran, Jr. (#21428)

BLACK McLAREN JONES RYLAND & GRIFFEE PC

530 Oak Court Drive, Suite 360

Memphis, TN 38117

(901) 762-0535 (Office)

(901) 762-0539 (Facsimile)

mmclaren@blackmclaw.com

wcochran@blackmclaw.com

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing has been filed via the Court's ECF system this 12th day of November 2020, for service on all persons registered in connection with this case, including:

Robert E. Craddock, Esq.
Odell Horton, Jr., Esq.
Meghan Cox, Esq.
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Drive, Suite 800
Memphis, Tennessee 38120
(901) 537-1000
rcraddock@wyattfirm.com
ohorton@wyattfirm.com
mcox@wyattfirm.com
*Counsel for Defendants Bill Oldham,
Robert Moore, Charlene McGhee,
Debra Hammons, and Shelby County, Tennessee*

Emmett Lee Whitwell, Esq.
SHELBY COUNTY ATTORNEY'S OFFICE
160 N. Main Street, Ste 950
Memphis, Tennessee 38103
(901) 222-2100
Lee.whitwell@shelbycountyttn.gov
*Counsel for Defendants Bill Oldham,
Robert Moore, Charlene McGhee,
Debra Hammons, and Shelby County, Tennessee*

Bradley E. Trammell, Esq.
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
(901) 577-2121
btrammell@bakerdonelson.com
Counsel for Tyler Technologies, Inc.

Beth Bivans Petronio, Esq.
K & L GATES, LLP
1717 Main Street, Suite 2800
Dallas, Texas 75201
(214) 939-5815
Beth.petronio@klgates.com
Counsel for Tyler Technologies, Inc.

Russell B. Bundren, Esq.
James L. Murphy, Esq.
BRADLEY ARANT OULT CUMMINGS, LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37210
bbundren@babco.com
jmurphy@bradley.com
*Counsel for Defendant Global Tel*Link
Corporation*

Douglas F. Halijan, Esq.
William D. Irvine, Esq.
BURCH PORTER & JOHNSON, PLLC
130 N. Court Avenue
Memphis, Tennessee 38103
(901)-524-5000
dhalijan@bpjlaw.com
wirvine@bpjlaw.com
Counsel for Defendant, Software AG USA, Inc.

Kevin D. Bernstein, Esq.
Albert G. McLean, Esq.
SPICER RUDSTROM, PLLC
119 s. Main Street, Suite 700
Memphis, Tennessee 38103
kbernstein@spicerfirm.com
amclean@spicerfirm.com
Counsel for Defendant Sierra-Cedar, Inc.

Robert A. McLean, Esq.
Garrett M. Estep, Esq.
FARRIS BOBANGO BRANAN, PLC
999 S. Shad Grove Road, Suite 500
Memphis, Tennessee 38120
(901) 259-7100
rmclean@farris-law.com
gestep@farris-law.com
Counsel for Defendant Tetrus Corp.

Heather Gwinn Pabon, Esq.
GORDON REES SCULLY MANSUKHANI
222 Second Avenue South, Suite 1700
Nashville, Tennessee 37210
(615) 772-9010
Counsel for Defendant Sierra Systems Group, Inc.

Brice M. Timmons
DONATI LAW, PLLC
1545 Union Avenue
Memphis, TN 38104
(901) 278-1004 (Office)
(901) 278-3111 (Facsimile)
brice@donatilaw.com

/s/ Michael G. McLaren